

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matters of)	
)	
Competitive Bidding Procedures for)	AU Docket No. 12-25
Mobility Fund Phase I Auction 901)	
)	
Universal Service Reform Mobility Fund)	WT Docket No. 10-208

To: The Commission

COMMENTS OF PANHANDLE TELEPHONE COOPERATIVE, INC.

Panhandle Telephone Cooperative, Inc. (“PTCI”), by its attorneys, hereby submits comments on the eligibility of certain census blocks for Mobility Fund Phase I support. Specifically, PTCI will demonstrate that a significant number of census blocks in Beaver County, Oklahoma and Cimarron County, Oklahoma¹ identified by the Federal Communications Commission (“FCC” or “Commission”) in its *Public Notice* released February 10, 2012² as being unserved by 3G or better mobile wireless service are in fact served with 3G or better mobile wireless service by PTCI and therefore should be removed from the list of eligible census blocks in the forthcoming Auction 901.

In calculating which census blocks within Beaver and Cimarron counties are served by 3G or better mobile wireless service, the Commission relies upon coverage data generated by individual mobile service providers which are then aggregated by Mosaik Solutions f/k/a American Roamer (“Mosaik”) to use as coverage maps in marketing material used by the carriers. The Commission’s most recent interactive map suggests that there are 10 unserved census blocks in Beaver County and 113 unserved census blocks Cimarron County. However, the maps created by Mosaik and relied upon by the Commission do not include 3G mobile wireless coverage data for PTCI, a provider of

¹ Beaver and Cimarron counties are located in CMA 596 (OK-1).

² “Mobility Fund Phase I Auction, Updated List of Potentially Eligible Census Blocks”, Public Notice, DA 12-187 (released February 10, 2012) (“*Public Notice*”).

mobile wireless broadband service in Beaver, Cimarron and other counties within the Oklahoma Panhandle. Today, PTCI does in fact provide 3G or better service in 3 of the 10 census blocks in Beaver County and 33 of the 113 census blocks in Cimarron County identified by the Commission.³ Attachment A depicts PTCI's current 3G coverage propagation map which has been overlaid on the unserved census blocks in Beaver and Cimarron counties. The combined map clearly depicts 3G or better mobile wireless service provided by PTCI in 36 unserved census blocks. Attachment B lists these same 36 census blocks in Beaver and Cimarron counties where PTCI today provides 3G mobile wireless services. For all of these reasons, the 36 census blocks originally deemed "unserved" by the Commission should instead be redesignated as "served" and accordingly must be removed from inclusion in Auction 901. PTCI fully supports the Commission's decision to award \$300 million in Mobility Fund Phase I support to rural markets. However, these scarce funds should be targeted to other rural markets in the United States that lack 3G services or the prospects for 3G or higher services. It is not in the public interest for the Commission to award funding to an area that already has 3G or better mobile services.

Respectfully submitted,

PANHANDLE TELEPHONE COOPERATIVE, INC.

By: */s/ Caressa D. Bennet*

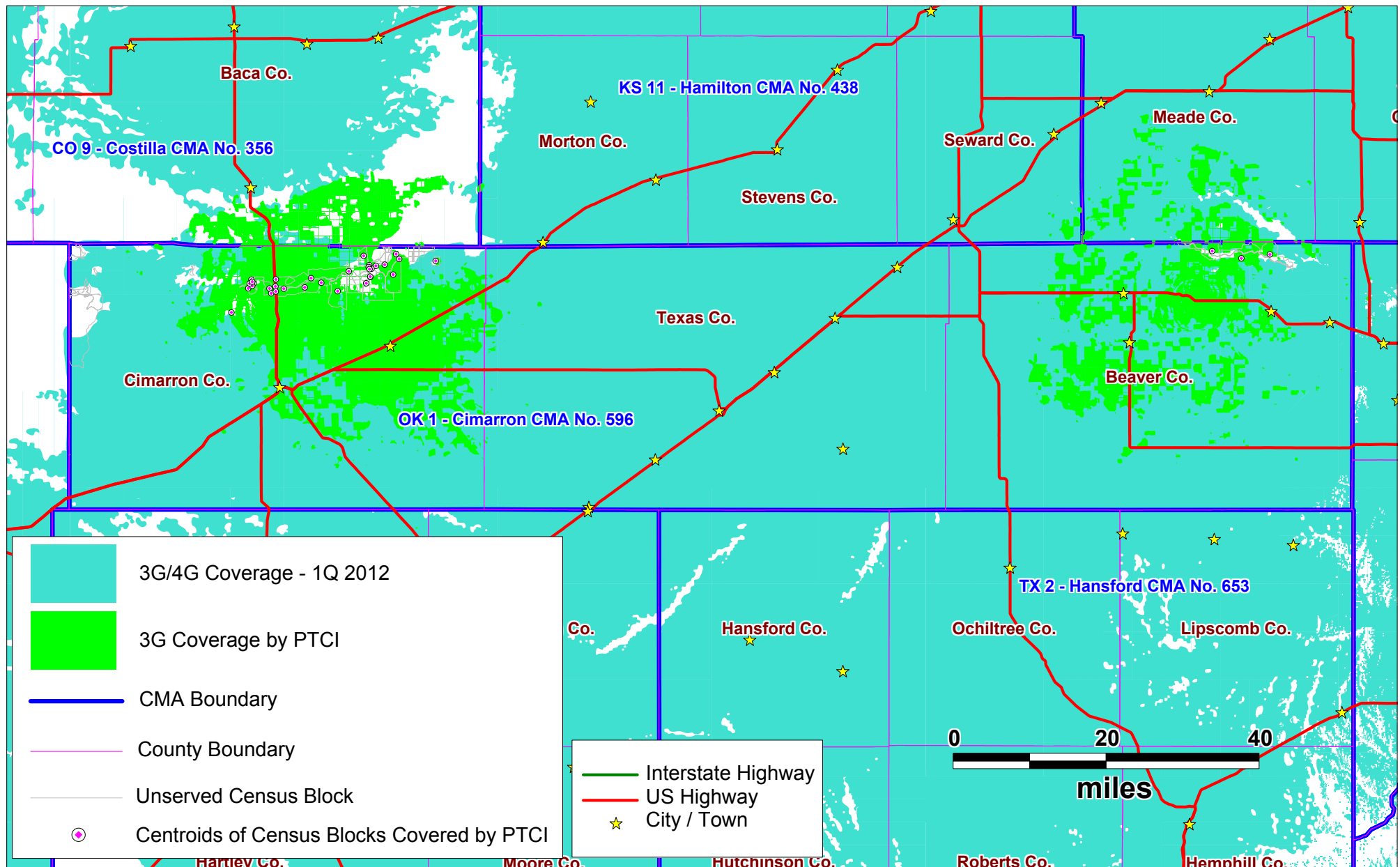
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Its Attorneys

March 16, 2012

³ In Q1 2012, PTCI reported its 3G coverage to Mosaik so that Mosaik could include this information going forward. Prior to this time, PTCI had not reported its coverage data to Mosaik nor had it used Mosaik's mapping services.

Attachment A: Unserved Census Blocks in CMA596 (OK-1 Cimarron) Served with 3G by Panhandle Telephone Cooperative, Inc.



March 16, 2012

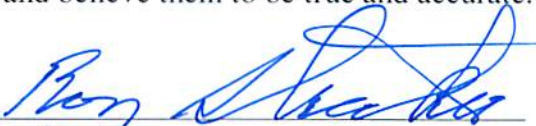
Attachment B: List of Served Census Blocks to be Removed from Auction 901

Census Block	State	County	CMA	Census Tract	Census Block Group
400079516001014	OK	Beaver	596	40007951600	400079516001
400079516001049	OK	Beaver	596	40007951600	400079516001
400079516001102	OK	Beaver	596	40007951600	400079516001
400259501001025	OK	Cimarron	596	40025950100	400259501001
400259501001041	OK	Cimarron	596	40025950100	400259501001
400259501001045	OK	Cimarron	596	40025950100	400259501001
400259501001046	OK	Cimarron	596	40025950100	400259501001
400259501001052	OK	Cimarron	596	40025950100	400259501001
400259501001053	OK	Cimarron	596	40025950100	400259501001
400259501001060	OK	Cimarron	596	40025950100	400259501001
400259501001061	OK	Cimarron	596	40025950100	400259501001
400259501001066	OK	Cimarron	596	40025950100	400259501001
400259501001078	OK	Cimarron	596	40025950100	400259501001
400259501001109	OK	Cimarron	596	40025950100	400259501001
400259501002071	OK	Cimarron	596	40025950100	400259501002
400259501002075	OK	Cimarron	596	40025950100	400259501002
400259501002086	OK	Cimarron	596	40025950100	400259501002
400259501002093	OK	Cimarron	596	40025950100	400259501002
400259501002095	OK	Cimarron	596	40025950100	400259501002
400259501002117	OK	Cimarron	596	40025950100	400259501002
400259501002119	OK	Cimarron	596	40025950100	400259501002
400259501002120	OK	Cimarron	596	40025950100	400259501002
400259501002132	OK	Cimarron	596	40025950100	400259501002
400259501002133	OK	Cimarron	596	40025950100	400259501002
400259501002135	OK	Cimarron	596	40025950100	400259501002
400259501002204	OK	Cimarron	596	40025950100	400259501002
400259501002915	OK	Cimarron	596	40025950100	400259501002
400259501002919	OK	Cimarron	596	40025950100	400259501002
400259501002922	OK	Cimarron	596	40025950100	400259501002
400259501002927	OK	Cimarron	596	40025950100	400259501002
400259501002928	OK	Cimarron	596	40025950100	400259501002
400259501002929	OK	Cimarron	596	40025950100	400259501002
400259501002935	OK	Cimarron	596	40025950100	400259501002
400259501002937	OK	Cimarron	596	40025950100	400259501002
400259501002938	OK	Cimarron	596	40025950100	400259501002
400259501002939	OK	Cimarron	596	40025950100	400259501002

DECLARATION OF RON STRECKER

I, Ron Strecker, do hereby declare under penalty of perjury under the laws of the United States of America, the following:

1. I am the CEO and an authorized officer of Panhandle Telephone Cooperative, Inc.
2. I have read the foregoing Comments. I have personal knowledge of the facts and representations set forth herein, and believe them to be true and accurate.



Ron Strecker

3 - 15 - 12

Date